



R05-14-A-044

Jackson County ADMINISTRATOR/CONTROLLER

Michael R. Overton, Administrator/Controller

Adam J. Brown, Deputy Administrator

January 21, 2014

Environmental Management Support, Inc.
Attn: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910
Phone: (301) 589-5318

**Re: U.S. EPA Brownfield Hazardous Substances and Petroleum Assessment Grant Proposal
Jackson County, Jackson County, Michigan – RFP No. OSWER-OBLR-13-05**

Dear Mr. West:

Jackson County (County) appreciates the opportunity to submit this proposal for a \$200,000 Brownfield Hazardous Substances, Community-Wide Assessment Grant and \$200,000 Brownfield Petroleum, Community-Wide Assessment Grant.

Jackson County is 722 square miles in size located in south-central Michigan between Chicago, Illinois and Detroit, Michigan. The County consists of one city, the City of Jackson, 19 townships and seven villages. Jackson County's economy has been heavily dependent on the industrial community since the mid-1800s. In the early 1900s, the County was home to many automobile manufacturers, none of which remain. Major manufacturing operations in Jackson County were constructed to support automotive manufacturing. These manufacturers clustered operations on the northern perimeter of the City of Jackson and the areas immediately surrounding the City limits.

We believe our program is experienced and sophisticated enough to take on a new, broader challenge. We have identified six Priority sites – all with significant redevelopment opportunities based on their size, location, and development potential. Local businesses have expressed serious interest in acquiring each site for business expansion. However, blighted conditions and serious potential public health exposures at these sites deter development interest. In order for these sites to become viable in the marketplace, advance assessment and cleanup planning work will be needed. The absence of responsible parties and State resources means this need falls to the local community. With this Assessment Grant we intend to begin the process of detailed evaluation of these sites, developing conceptual plans for a safe and effective redevelopment, and better understanding of actual public health risks from these threatening sites. Through redevelopment, we believe we will improve the local neighborhoods through eliminating hazards and blighted conditions, providing new jobs and investment to the Community. We also intend to support 4-6 additional redevelopment projects at smaller, less complex sites. We are pledging significant local resources to make this success possible – but the need is great. The support from U.S. EPA is vital to protecting our citizens and tackling these large, complex sites.

Jackson County Tower Bldg., 120 W. Michigan Avenue, Jackson, MI 49201
Phone: (517) 788-4335 FAX: (517) 780-4755

The County has demonstrated success and competence in managing economic redevelopment grants throughout the County, and the Hazardous Substances and Petroleum Assessment Grant will provide a resource for us to continue to confront the most significant and looming challenges posed by brownfields in our community. Thank you for your time in consideration of our grant request. If you have any questions or require additional information, please do not hesitate to contact us.

Respectfully submitted,



Michael Overton
County Administrator/Controller

Applicant Information:

a. Applicant Name:	Jackson County	ii. Chief Executive Officer:	Michael Overton County Administrator
Applicant Address:	One Jackson Square, Suite 1100 Jackson, MI 49201		120 W. Michigan Avenue Jackson, MI 49201
b. Applicant DUNS Number:	08-8328-877	Phone:	(517) 768-6624
c. Funding Requested:		Fax:	(517) 788-4601
i. Grant Type:	Assessment Grant	Email:	moverton@co.jackson.mi.us
ii. Amount	\$400,000	g. Date Submitted:	January 22, 2014
iii. Contamination	Hazardous Substances (\$200,000) and Petroleum (\$200,000)	h. Project Period:	Three years
iv.	Community-wide	i. Population:	Jackson County – 160,309 (U.S. Census, 2013 Estimate)
d. Proposed Location:	Jackson County, Michigan	j. "Special Considerations" checklist	Attached
e. Not Applicable			
f. i. Project Director:	Amy L. Torres Executive Director – Enterprise Group, Inc. One Jackson Square Suite 1100 Jackson, MI 49201		
Phone:	(517) 788-4458		
Fax:	(517) 782-0061		
Email:	atorres@enterprisegroup.org		

Ranking Criteria for Assessment Grants

1. Community Need

1.a Targeted Community and Brownfields

1.a.i Targeted Community Description

Jackson County is 722 square miles in size located in south-central Michigan between Chicago, Illinois and Detroit, Michigan. The County consists of one city, the City of Jackson, 19 townships and seven villages. Jackson County's economy has been heavily dependent on the industrial community since the mid-1800s. In the early 1900s, the County was home to many automobile manufacturers, none of which remain. Major manufacturing operations in Jackson County were constructed to support automotive manufacturing. These manufacturers clustered operations on the northern perimeter of the City of Jackson and the areas immediately surrounding the City limits. These manufacturers used the power of the Grand River for power, cooling water, and waste disposal. Across the County, old manufacturing operations and mills are located along the river banks, often accompanied by large amounts of fill material that allowed these structures to be constructed in the floodplain. In recent years, Jackson County suffered a number of economic setbacks, with many major manufacturers leaving Jackson and abandoning their antiquated facilities. They often deteriorate and attract criminal activity and vandalism. Indeed, one of Jackson County's Priority Sites is occupied by a burned-out pile of rubble resulting from arson of a 100-year old manufacturing site (*Former Sparton Corp. site*).

This grant will be used to address Brownfield sites throughout the County. We have identified several large and complicated sites that need assistance. Most of these sites are in Blackman Charter Township just at the edge of the County's only City – the City of Jackson. This township has a higher concentration of known impacted sites compared to other sections of Jackson County. This is in large part due to the Township's manufacturing history that was historically located on the outskirts of the City. We have also identified a high priority site within the City of Jackson and a high priority site in an outlying Village – the Village of Brooklyn. These sites are relatively large properties existing in high-density urban areas.

These sites have many significant environmental concerns and do not have liable parties that are addressing contamination or other conditions and thus, the County is seeking Assessment Grant funds to address the public health concerns and environmental conditions to foster redevelopment.

Priority Area/Site	Local Unit of Government	Acreage	Census Tract	Census Tract Population	% Minority
Jackson County	Jackson County		NA	160,248	11.7%
Michigan Industrial Holdings	Blackman Twp.	20.3	Census Tract 59	12,334	38.4%
Former Sparton Corp	Blackman Twp.	7	Census Tract 59	12,334	38.4%
Former Plastigage	Blackman Twp.	14	Census Tract 55	10,202	8%
Former Harvard Industries	Blackman Twp.	20	Census Tract 55	10,202	8%
Mill Street	Brooklyn Village	10.62	Census Tract 63.02	4,520	4.2%
Former Acme Industries	City of Jackson	5	Census Tract 200	2,913	29.56%

*All Census Tract Data has been compiled from www.usa.com

1.a.ii Demographic Information

	Targeted Community	Jackson County	Michigan	National
Population	33,534 ⁶	160,248 ⁶	9,876,187 ⁴	308,745,538 ¹
Unemployment	9.8% ⁶	9.09% ⁶	9.3% ⁵	7.2% ²
Poverty Rate	29% ⁶	19.76% ⁶	17.5 ²	15.1% ³
Percent Minority	28.59% ⁶	12.32% ⁶	25.4 ⁶	26.7% ¹
Median Household Income	\$30,641 ⁶	\$46,117 ⁶	\$48,471 ¹	\$ 49,445 ³

¹Data is from the 2010 U.S. Census data and is available at www.census.gov/ ²Data is from the Bureau of Labor Statistics and is available at www.bls.gov/ ³Data is from the 2010 American Community Survey and is available at http://www.census.gov/newsroom/releases/archives/income_wealth/cb11-157.html ⁴U.S. Census Bureau 2011 Estimates
⁵Michigan Department of Budget and Technology (milmi.org); ⁶www.usa.com

The City of Jackson has a population of 33,534 with average poverty rate of 29% and median household income at \$30,641. The target community is comprised of lower-income neighborhoods with minority populations that make up a greater percent of the population than the County, State and National averages. According to the 2000 U.S. Census, the City of Jackson had a population of 36,316. 2010 census data show an 8% decline in population over 10 years. This population loss has been attributed to a loss of jobs in the area – primarily manufacturing jobs. This exodus has placed additional burdens on the City and County as tax revenues decline and excess housing lies vacant. The City of Jackson had 19.65% of its population in poverty in 2000 and currently 29% of its population lives in poverty. The rise in poverty is attributable to the loss of higher wage jobs in manufacturing that have been lost over the years. We believe that this data demonstrates that the City and immediately surrounding urban neighborhoods in Blackman Township shows that the targeted community is poorer and more likely to be unemployed than other parts of Jackson County, the State or Nation.

1.a.iii Brownfields

Jackson County is historically a manufacturing community. Our target community is the City of Jackson and land that immediately surrounds the City limits which was historically the center of manufacturing. These former industrial areas are primarily east and west of the City limits. These two areas have been the victim of disinvestment in the community as newer industrial developments have been placed in industrial parks located even further from the City center. We have targeted some of the most complicated sites to deal with in these two areas, hoping that efforts at these properties will spur redevelopment of the neighborhoods and other nearby brownfield sites.

The *Michigan Industrial Holdings Site* (MIHI) and the *former Sparton Corp site* are adjacent Brownfield sites in Blackman Township. Both are former manufacturing sites. A mobile home park and old working class neighborhood with a relatively low-income population resides immediately adjacent to these two sites. The MIHI site is a vacant parcel of land but previous studies indicated the presence of non-aqueous phase liquid petroleum at this site which may inhibit development. The former Sparton site contains demolition debris from a fire that destroyed the onsite buildings. This debris has sat in a large and dangerous pile since the fire occurred in March 2011. These sites are not secured and neighbors, children, and homeless people have relatively free access to these properties, inadvertently becoming exposed to the chemical and physical hazards, including asbestos, lead and chlorinated solvents, increasing their risk of lead poisoning, asthma, lung diseases, and cancers.

The former Plastigage site and the former Harvard Industries site are within 0.5 miles of each other, two large former manufacturing complexes also located in Blackman Township at the edge of the City of Jackson. These sites are also located in a medium to low income working class neighborhood that had been the housing stock for workers at the historic factories in the area. The Plastigage site had been used originally to make brake pads and later was a plastic extrusion company. Contamination from phthalates and other industrial contaminants have been found on site. Additionally, the buildings were demolished and a significant amount of demolition debris remains on this unsecured site. The Harvard Industries site has significant impacts on site from trichloroethylene and petroleum contaminants. These conditions have hampered plans to re-use the building and possibly spur new development on portions of the property.

The Mill Street property in the Village of Brooklyn is an old Ford Automotive Manufacturing Plant that had made horn buttons, distributor caps, starter switches and spark plugs between the 1930s and 1960s. It was then used by a gear manufacturer. The property is an old mill site and still has a dam and operable turbine. The building has been underutilized or vacant since 1990. Trichloroethylene contamination was identified at the site.

The former Acme Industries site is an old industrial site – one of the oldest in the City of Jackson – originally used to make farm implements and wagons. Later it was used by a company that manufactured heating and cooling equipment. Investigations on this site have found carbon tetrachloride, chlorinated solvents and heavy metals. The site is a fenced vacant lot in the middle of a growing arts-based neighborhood development project.

Priority Site	Known or Suspected Contaminants	Health Effects
Former Plastigage	Cis and trans 1,2-dichloroethylene, tetrachloroethylene, phenanthrene, phthalates, arsenic, asbestos	Liver, kidney and central nervous system disease, increased cancer risk, asthma sensitivity, headaches, skin rash and irritation, lung irritation, nausea, decreased white and red blood cell production, mesothelioma
Former Harvard Industries	Chlorinated solvents, petroleum	
Former Sparton Corp	Metals, solvents, petroleum, semi-volatile organic compounds, asbestos	
Mill Street Property	Trichloroethylene, arsenic, lead, polynuclear aromatic hydrocarbons	
Former Acme Industries	Carbon tetrachloride, chlorinated solvents, heavy metals	
Michigan Industrial Holdings	Petroleum, metals, free-phase petroleum	

*from Agency for Toxic Substances and Disease Registry Toxicological Profiles

Additionally, the Michigan Department of Environmental Quality (MDEQ) has identified and placed on its list of **hazardous substance contaminated sites 96 locations** within Jackson County (www.michigan.gov/deq). Additionally, the MDEQ has identified **168 open leaking underground storage tank (LUST) petroleum contaminated sites** and 181 closed LUST sites within Jackson County (www.deq.state.mi.us/sid-web/LUST_Search.aspx). These properties are generally clustered around the City of Jackson and the former industrial land immediately surrounding the City.

1.a.iv Cumulative Environmental Issues

The neighborhoods that house these brownfield sites have residential neighbors in very close proximity to each site which were historically the housing stock for workers at the factories. There are major thoroughfares near each site and Interstate 94 (the main interstate between Chicago and Detroit) is within one mile of the Blackman Township and City of Jackson sites. These same residents thus are also exposed to diesel emissions from the heavy truck traffic on these roads. Fifteen private water supply wells are within 0.5 miles of the *MIHI* and *Former Sparton Corp* sites in the eastern part of Blackman Township. Over 120 private water supply wells remain in use in the residential neighborhood immediately adjacent to the *Plastigage* and *Former Harvard Industries* sites in the western part of Blackman Township where an area-wide groundwater plume of chlorinated solvents has already been identified. There is a possibility that certain residents may be exposed, or were previously exposed, to contaminants through ingestion of groundwater. Several brownfield sites in the Target Community, including some of the priority sites, are not secure and residents may be exposed to dusts, contaminated soils, and physical hazards as they trespass on these properties. A trailer park downwind of the Sparton Corp. site are potentially exposed to wind borne dust from the demolition debris which may contain lead, other heavy metals, or asbestos fibers.

1.b Impacts on Targeted Community

These sites can cause adverse impact on the health of the target communities through the migration of contaminants through air, groundwater, storm water run-off and vapor intrusion into buildings. 15 private water supply wells are within 0.5 miles of the *MIHI* and *Former Sparton Corp* sites in the eastern part of Blackman Township. Over 120 private water supply wells remain in use in the residential neighborhood immediately adjacent to the *Plastigage* and *Former Harvard Industries* sites in the western part of

Blackman Township where an area-wide groundwater plume of chlorinated solvents has been identified. Thus, several of the priority brownfield sites pose a risk to drinking water supplies, and environmental investigations on some of these sites has not been adequate to fully evaluate the risk of exposure. Additionally, where volatile organic compounds have been detected such as the Former Harvard Industries site, the risk of vapor intrusion into nearby residential and commercial structures exists. The unsecured condition of several sites poses a risk of exposure through direct dermal contact with contaminants as residents, particularly children, find such sites an enticing area to play and explore. Observations indicate that the MIHI site has become a location where homeless people reside.

These brownfield sites contribute to the health risks of the adjoining population. Data from the Michigan Department of Community Health (MDCH) demonstrates that Jackson County residents suffer from higher than average rates of cancer and low birth weight.

	Jackson County	Michigan
People over 18 years with asthma ¹	11.8%	N/A
Children under 18 years with asthma ¹	1.7%	N/A
Rate of Hospitalizations due to Asthma- 18 years and older (per 10,000 people) ²	14.9	14.1
Rate of Hospitalizations due to Asthma- 0-17 years (per 10,000 people) ²	25.8	22.1
Rate of Hospitalizations due to Asthma- black population (per 10,000 people) ²	31.7	47.5
Rate of Hospitalizations due to Asthma- white population (per 10,000 people) ²	15.8	11.1
Cancer Rate (per 100,000 people) ¹	185.7	182.4
Low Weight Births (per 1,000 people) ¹	89.8	84.4

All Data from the Michigan Department of Community Health 2010 Profiles; ²Asthma Initiative of Michigan, 2004-2006

Unfortunately, **sensitive groups** in the Priority Site areas, such as children, impoverished families, minorities, and pregnant women are more susceptible to these impacts. Many residents lack adequate resources to address the negative health effects associated with brownfield sites. In 2009, Medicaid insured 39.3% of children under 18 years old (*Kids Count Data Center*). Also in 2009, Medicaid paid for 53.7% of all births in the County (*Kids Count Data Center*). Out of the total births in the County in 2007, 28.1% had less than adequate prenatal care (*Kids Count Data Center*). The African-American population is significantly more prone to asthma, and with the neighborhood surrounding the MIHI and former Sparton Corp. properties being 38.4% African American (2000 Census data set), this particular sensitive population is more at risk from asthma-triggering impacts from these two uncontrolled brownfield sites. Asthma related hospitalizations are the fourth highest cause of hospitalizations among children ages one to 19 (MDCH 2010 Profiles), demonstrating the sensitivity of this population to asthma-triggering impacts from brownfield sites. In 2007, 20.1% of children in Jackson County were living in poverty (*Kids Count Data Center*). There are five school districts located in Blackman Charter Township, the target area. Many of these schools provide free or reduced lunches to a significant portion of the student body. Most notably, Hunt Elementary School which serves the neighborhoods adjacent to the *Plastigage* and *Former Harvard Industries* site, provides free or reduced lunch to 80.6% of its students (ZIPskinny.com). The **cumulative effect** of unemployment, poverty, and proximity to sources of environmental contamination has a **disproportionate impact** on residents living near these brownfield sites.

Brownfields in these neighborhoods **adversely impact the welfare of the target community**. The *Michigan Industrial Holdings* site is an overgrown, unsecured vacant site, easily accessible to children in the adjacent mobile home park. It appears that homeless persons may be residing on this land, and such sites attract criminal activity. The *Former Sparton Corp* site is in this same area. It was a vacant industrial site until in late 2011, when the site burned to the ground as a result of arson, and is now a pile of brick and concrete with unstable portions of the former building walls still standing. The out-of-state owner lacks financial resources to remove the debris. The site is particularly attractive to adventuresome children residing in the adjacent trailer park. The health and safety hazards at this site are severe and include potential collapse of structures, puncture hazards, sumps, pits and subterranean areas that are not

securely covered. Such sites discourage investment in neighboring properties, resulting in a cascading devaluation of property in the targeted areas and disproportionately depressed economic conditions, higher crime rates, and increased adverse health risks. Additionally, these brownfield sites are a significant detriment to the County tax base where cumulatively the potential loss in tax revenues exceeds \$100,000 per year. During site inspections on many of these properties there was evidence of criminal activity, drug use, and shelter for homeless persons. It would appear that these Brownfield properties adversely impact the welfare of residents in the Target Community who are exposed to the negative influences of crime, drug use, etc. at a greater rate than other local suburban neighborhoods.

1.c Financial Need

1.c.i Economic Condition)

Jackson County is still recovering from the effects of the "Great Recession". According to the Michigan Department of Technology, Management and Budget, unemployment rates in Jackson County rose sharply from 6.4% in April 2008 to 14.1% in December that same year. Throughout 2009-2011, unemployment hovered around 12-14%. Monthly unemployment rates in 2012 ranged from 9.5% to 7.4% and at the end of 2013 was 8%. According to the USDA 2010 Poverty Data Set, Jackson County has a 14.9% poverty rate, consistent with the State and national poverty rates. The rate of children in poverty, however, has risen sharply since 2006. The economic data are reflective of the working class status of Jackson County's residents. Data just released from the Bureau of Labor Market Information and Strategic Initiatives of Southwest Michigan show a net loss of 2,400 non-farm jobs since 2008 (approximately 5% of all non-farm jobs in the County). This represents an annual loss in income within the County of over \$50 Million. The loss of jobs is primarily related to plant closings and lay offs over the past five years. Worker Adjustment and Retraining Notification (WARN) data for Jackson County includes notifications for three manufacturing plant closings, three mass layoffs, and three other notifications showing a loss of 810 jobs from these 9 locations. One of these locations (Sparton Electronics with a mass lay off of 206 persons) is one of our priority sites. There have been other layoffs and smaller plant closings that are not included in the WARN data. This loss of jobs has had an impact on property values and tax revenues to the community. Since 2008, total taxable values have dropped by about 10% resulting in a loss of \$500 Million in taxable value. This has resulted in a loss of tax revenues to the County of \$3-\$4 Million per year during this period. Combined with other factors such as a decrease in the State's contribution to local budgets, the result is an ever-decreasing amount of revenue to fund programs. The County has no funds in its General Fund dedicated to Brownfield Redevelopment and must rely upon grant funding, such as this Assessment Grant, to be able to jump start development on complex sites. There is limited funding in the County's Brownfield Redevelopment Authority to handle two to three small projects on an annual basis, which is insufficient to address the identified priority sites in the community.

1.c.ii Economic Effects of Brownfields

As detailed above, the community has suffered from a significant loss of jobs (5% of all non-farm jobs), wealth, and taxable income (\$3-4 Million annually) according to the Bureau of Labor Market Information and Strategic Initiatives of Southwest Michigan. Brownfield sites in the community contribute to this decline. Just the priority sites alone have been responsible for a loss of over 500 jobs and an estimated loss of \$200,000 in annual local tax revenues. At two of the priority sites, taxes have not been kept current, and it is likely that one of the sites may revert to the County. One of the priority sites is already held by the local unit of government and contributes no taxable revenue. The community has already been afflicted by depressed property values and the brownfields deter investment in the neighborhood which continues to suppress property values.

The **economic impact** of brownfields on the target community's earning power is evidenced by the Per Capita Income of the County (\$29,488) far below the national rate of \$51,914 (2010 U.S. Census Bureau). Median Family and Household Incomes in the target community have also been negatively impacted.

Median Family and Household Incomes in Area of Priority Sites (includes State and National)		
	2010 Census Tract Median Family Income ¹	2010 Census Tract Median Household Income ¹
MIHI and Sparton Corp Area (Blackman Twp.)	\$26,085	\$23,906
Harvard Industries and Plastigage (Blackman Twp.)	\$38,030	\$36,443
ACME Industries (City of Jackson)	\$23,750 ³	\$25,323 ³
Jackson County, MI	\$38,450 ³	\$30,641 ³
Michigan	\$56,101 ³	\$45,413 ³
National	N/A	\$53,046 ⁴

1. Federal Financial Institutions Examination Council (2010), 2. U.S. Census Bureau, 2006-2010 American Community Survey 3. data is from www.usa.gov

2. Project Description and Feasibility of Success

2.a Project Description

2.a.i Project Description

Jackson County developed a **Strategic Plan** (Jackson 2020) to articulate County **goals and vision** in community safety, economic development, public health, education, and effective governance. This Strategic Plan was developed in a collaborative manner with participation from over 20 groups representing local units of government, education, health care, community health and welfare agencies, non-profits, work force development, and economic development. One of the stated goals in this plan focuses on intergovernmental cooperation to effect economic development – including at brownfield sites. Site-specific planning activities have also been conducted which have included communications with neighboring property owners, local units of government, the MDEQ, discussions at open public meetings, etc. The County has been working with businesses that are experiencing growth and have been directed to brownfield sites for development opportunity. In some cases, this has led to committed development opportunities. In others, redevelopment of a specific brownfield has led to a neighborhood planning approach. For example, an ad hoc committee has been developing a plan for the redevelopment efforts of the neighborhood that includes the former Acme Industries site. This effort involved a community charrette process attended by the local units of government, neighbors, community leaders, and technical support staff. These efforts have provided elected officials and community leaders, businesses and neighbors with a vision for how to redevelop this neighborhood and have made the neighborhood a priority area for traffic studies, infrastructure upgrades and additional community planning efforts – all activities that help spur investment in the area.

This project has been designed to address priority sites consistent with the County Strategic Plan and other Action Plans to 1) improve community safety by eliminating the physical hazards and safe havens for criminal activity, 2) create economic development opportunities, 3) improve the public health by better controlling the risks present at these sites, and 4) through partnerships, provide education and involvement opportunities to residents interested in environmental careers and issues.

All of the Priority Sites have strong identified development potential. We believe the Assessment Grant funding will help make the development potential a reality by overcoming some of the upfront costs, eliminating uncertainties related to the environmental risks at properties, and providing liability protection to new owners. A developer is interested in a multi-use development of the Mill Street property in Brooklyn. A business located near the MIHI and Sparton Corp sites is interested in acquiring both properties for business expansion. A manufacturer near the former Harvard Industries site has expressed interest in acquiring the property for business expansion. However, without funding to assess the environmental issues, development interest is deterred due to the costs and uncertainties. Assessment grant funds would be used to conduct **assessment and cleanup planning activities** at Priority Sites and will involve property access agreements, technical review of existing data, conducting soil, groundwater and vapor intrusion investigations to delineate contamination and development of conceptual cleanup and/or site control plans for effective and safe re-use of the property. In cases where public health issues are a prevailing concern, we envision advance consultation with the County Department of Public Health and MDEQ. We envision a need for skilled and tactful communication with the public regarding potential

public health issues and will rely on the Health Department and possibly others (Technical Assistance for Brownfield Communities, Agency for Toxic Substances and Disease Registry) to help communicate this data to the affected community. **Cleanup planning** for activities such as removal of demolition debris, extension of public water supplies, and building demolition will need to be developed – both technically and financially. We will pursue funding through the MDEQ Brownfield Redevelopment Grant/Loan program, Michigan Strategic Fund Community Revitalization Program for site preparation costs, write and adopt Brownfield Plans to capture tax increment for cleanup costs, and evaluate other financial resources to supplement the grant. This may include pursuit of U.S. EPA Cleanup Grants or BCRLF funds (though pursuit of these other USEPA grants would not be paid for with the Assessment Grant). As cleanup and redevelopment plans are prepared, we plan to communicate the viability for development of the property to the affected community, business leaders, local lenders, local units of government, and others. Our partnerships with various business and community groups will aid in this effort. Based on our planning efforts to date, we are projecting the following types of redevelopment projects to occur during the grant period.

Priority Area/Site	Anticipated Development	Anticipated Assessment needs	Anticipated Grant Costs
Former Harvard Industries	<i>Committed Developer in place. New industrial operation to expand local manufacturer, new construction of commercial space</i>	AAI, contaminant delineation, vapor intrusion investigation, asbestos survey, cleanup planning.	\$25,000 (petroleum) \$35,000 (hazardous substance)
Mill Street Property	<i>Committed Developer in place. Mixed use commercial space with restaurants, shopping, leisure activities</i>	AAI, groundwater investigation, check drinking water supply wells	\$20,000 (hazardous substance)
Former Sparton Corp.	Interested Developer in place. Expansion of nearby industrial operation onto property	AAI, soil and groundwater investigation, cleanup planning for demolition debris, asbestos survey.	\$25,000 (hazardous substance)
Michigan Industrial Holdings	Interested Developer in place. Expansion of nearby industrial operation onto property	AAI, soil and groundwater investigation, delineate free phase product, vapor intrusion investigation	\$ 30,000 (petroleum)
Former Plastigage	New Construction of Industrial/Commercial Space	All Appropriate Inquiry (AAI), contaminant delineation to support construction planning, liability protection, vapor intrusion investigation, cleanup planning for demolition debris and contaminated surface soil removal.	\$20,000 (hazardous substance)
Former Acme Site	New construction of commercial space, redevelopment of one historic building	All Appropriate Inquiry (AAI), contaminant delineation to support construction planning, liability protection, vapor intrusion investigation, cleanup planning for demolition debris.	\$15,000 (hazardous substances) \$15,000 (petroleum)

In addition to these high priority sites, we envision four to six additional projects on smaller, former industrial sites in the Target Community. The types of redevelopment projects typically encountered include re-purposing abandoned industrial sites near downtown areas for mixed commercial use with residential lofts, and new construction.

The **assessment needs** at sites will typically include a Phase I ESA compliant with AAI and ASTM Standards. Phase II ESAs including soil, groundwater and vapor intrusion investigations will be needed to provide data that can be used to plan property re-use, identify cleanup needs, identify institutional and engineering controls that protect the public and environment, and assist in securing liability protection. Baseline Environmental Assessments and Due Care Plans are required components under Michigan law to secure liability protection. Certain properties may require surveys for asbestos-containing materials, lead, or other hazardous materials. The **expected outcomes** from funded projects will be new economic investment and job creation, improved employment metrics across the County, cleanup or control of environmental contamination and public health threats, new taxable value and revenues to the local unit of government. Based on other projects that have been managed in the past, we are anticipating the following outcomes:

Priority Area/Site	Potential Investment	Potential Job Creation	New Tax Revenues to Local Unit of Governments
Former Harvard Industries	\$500,000 in new construction	20 – 50 new jobs	\$25,000/year
Mill Street Property	\$500,000 in renovations	10-30 new jobs	\$25,000/year
Former Sparton Corp.	\$100,000	5-10	\$10,000/year
Michigan Industrial Holdings	\$100,000	5-10	\$10,000/year
Former Plastigage	\$500,000 in new construction	10-25	\$20,000/year
Former Acme Site	\$1,000,000 in new construction and renovation of historic building	10-30	\$25,000/year
TOTAL	\$2.7 Million	60 – 155 new jobs	\$115,000/year

We expect the **outputs** to include Phase I ESAs compliant with AAI and ASTM Standards, Phase II ESAs, BEAs and Due Care Plans, Brownfield Plans, and other documents that detail cleanup plans, costs, incentives, etc. Minutes from public meetings, correspondence with the public, brochures and communications to the business community and other outreach components will also be expected outputs.

2.a.ii Project Management Approach

The County has an experienced, **established team**, capable of implementing projects using the Assessment Grant and other tools that leverage its value. The County will utilize its Brownfield Redevelopment Authority to implement the Grant. The Authority is staffed by The Enterprise Group, a nonprofit organization responsible for County economic development. Assigned staff includes Ms. Amy Torres and Ms. Debbie Kelly who have over 15 years of direct experience managing Brownfield Redevelopment Authorities and related programs. Ms. Torres and Kelly have managed two USEPA Assessment Grants, a USEPA BCRLF Grant, a USEPA BCRLF Pilot. The County has relationships with private consulting firms for technical expertise beyond that provided by the MDEQ. These consultants offer technical services, experience and business acumen, and these professional service resources will be used in compliance with 40 CFR 30, 31 and 33 requirements as applicable.

2.a.iii Site Selection

As described in this proposal there are several priority sites where we anticipate utilizing the Assessment Grant. Access to all but one site has already been secured through owner participation or negotiated agreements. However, grant funds will also be available for other projects that arise during the grant period. The County has a process in place including an Application Form and Scoring System. Potential projects are selected for action based on the following parameters: Strength of redevelopment business plan, financial commitments; Amount of investment, job creation; Amount of property taxes generated; Proximity to Target Community, whether the project is leveraged by other previous brownfield redevelopment efforts; Compliance with zoning, Master Land Use Plan, and support from Local Unit of Government; Extent to which environmental conditions are alleviated, sustainability factors, energy efficiency factors, project amenities

These same program evaluation factors match the desired outcomes of the Assessment Grant Project. A recommendation to use grant funds for a site would be developed by staff and a supporting resolution from the Brownfield Redevelopment Authority secured at a Public Meeting in order to use the grant funds. In preparation of this decision process, staff and technical providers evaluate site eligibility requirements and other technical issues to ensure the project is technically viable and fundable. The local community is requested to provide input into the funding decision. Access to sites is secured through a developer's Purchase Agreement or Access Agreement.

2.b Task Description and Budget Table

2.b.i Task Description

Task 1: Phase I Environmental Site Assessments (ESAs):

Conduct Phase I ESAs following ASTM and All Appropriate Inquiry. This Task will involve the completion of ESAs following ASTM and AAI standards using qualified environmental consultants. The Budget estimates five Phase I ESA's at Priority Sites using Hazardous Substance Grant funds (total \$22,000). The Petroleum Assessment Grant budget assumes seven Phase I ESAs (total \$25,000). Phase I ESAs costs for the types of properties anticipated under this grant typically range from \$2,500 – \$5,000. Costs in this task also include Eligibility Demonstrations (hazardous substances grant) and Determination Requests (petroleum grant). Total outputs anticipated: 12 ASTM/AAI compliant Phase I ESAs.

Task 2: Environmental Investigations (Phase II ESAs and Liability Protection):

Conduct Phase II ESAs at identified Brownfield sites and if appropriate, BEAs for liability protection and Due Care Plans to address "continuing obligations" following MDEQ guidelines as agreed in the Brownfield Memorandum of Understanding between EPA and the State of Michigan. Services will be completed using a qualified environmental consultant. This task also will include the preparation of a Quality Assurance Project Plan (QAPP), Sampling and Analysis Plans and development of Health and Safety Plans (HASP). The Hazardous Substances budget assumes five environmental investigations in varying degrees of complexity ranging from \$10,000 to \$60,000 for a total task budget of \$138,000. The Petroleum Assessment budget assumes seven investigations ranging in cost from \$12,000 to \$50,000 for a total task budget of \$137,000. Total outputs anticipated: one QAPP, 12 Sampling and Analysis Plans, 12 HASPs, 12 Technical Reports of Field Investigations, BEAs and Due Care Plans.

Task 3: Cleanup Planning:

The funds will be used in association with any of the priority sites to prepare Brownfield Plans, Redevelopment Plans, Conceptual Site Plans and other documents that help communicate future land uses, construction and development related challenges, costs and obligations for a safe redevelopment project. Funds within this task may also be used in efforts to secure leveraged funds or support from the MDEQ, Michigan Strategic Fund, and other programs and agencies that can support the redevelopment. \$30,000 of the Hazardous Substances Assessment Grant funds and \$25,000 of the Petroleum Assessment Grant funds will be dedicated to support these activities. Total Anticipated Outputs: up to 12 technical documents outlining conceptual cleanup, redevelopment plans and financial resources to be deployed.

Task 4: Community Outreach, Programmatic Expenses & Travel:

This task involves activities related to community outreach including:

- Registering and travel to the National Brownfield Conference and other pertinent educational and training events. (\$2,500 from each grant)
- Preparing for, attending and participating in public hearings, JCBRA meetings, and Public meetings. Working with MDEQ and Health Department to strategize communications to the public.

- Educating and informing community groups, realtors, developers and interested parties about the Grant and benefits of Brownfield Redevelopment. Interaction with neighborhood groups and project partners.
- Hosting community sessions to communicate redevelopment progress and secure input for equitable and sustainable development outcomes (e.g., considering end uses for properties, community involvement and promoting job opportunities)
- Create and disseminate brochures about Brownfield Redevelopment and other outreach activities
- Outputs would include printed materials, minutes and agendas from public meetings, presentation materials, website content.

2.b.ii Budget Table Hazardous Substances Assessment Grant

Budget Categories	Task 1 Phase I ESAs	Task 2 Environmental Investigations	Task 3 Cleanup Planning	Task 4 Community Outreach, Programmatic Expenses & Travel	Total
Personnel				\$ 9,500	\$ 0 (in kind donation)
Fringe Benefits					
Travel				\$ 2,500	\$ 2,500
Equipment					
Supplies					
Contractual	\$ 22,000	\$ 138,000	\$ 30,000	\$ 7,500	\$197,500
Other					
Total	\$ 22,000	\$ 138,000	\$ 30,000	\$10,000	\$200,000

Petroleum Assessment Grant

Budget Categories	Task 1 Phase I ESAs	Task 2 Phase II ESAs and Liability Protection	Task 3 Cleanup Planning	Task 4 Community Outreach, Programmatic Expenses & Travel	Total
Personnel				\$9,500	\$ 0 (in kind donation)
Fringe Benefits					
Travel				\$ 2,500	\$ 2,500
Equipment					
Supplies					
Contractual	\$ 25,000	\$ 137,000	\$25,000	\$ 10,500	\$197,500
Other					
Total	\$ 25,000	\$ 137,000	\$25,000	\$13,000	\$200,000

2.c Ability to Leverage

The County pledges funds that have been raised by the Brownfield Redevelopment Authority through Brownfield Plans, Tax Increment Finance capture, and Brownfield Revolving Loan Fund repayments to leverage this USEPA Assessment Grant request. To date, the Authority has collected approximately \$60,000 to support future brownfield projects in Jackson County and thereby leveraging the support of the USEPA Assessment Grant. The County will also seek funding from a variety of resources to leverage Assessment Grant monies. Where possible, the County can secure grant or loan funds from the MDEQ for assessment and cleanup activities. Funds are awarded on a competitive basis with up to

\$1,000,000 available in both grant and loan funds. The Michigan Strategic Fund Community Revitalization Program provides grant and loan funds to pay for demolitions, asbestos abatement, infrastructure, and other site improvements. These funds are extremely competitive, and the amount of funding is need-based. The County can also use funding from the HUD Neighborhood Stabilization Program, other State and Federal programs or general appropriations. Where there is a strong overlap between the County's Strategic Plan and redevelopment potential of the Priority Sites, we will seek additional public support. For assistance in the Cleanup Planning and Community Engagement activities, we may seek assistance from the Technical Assistance for Brownfield Communities (TAB) programs.

We may also pursue leveraged support from the Jackson Community Foundation, which has identified projects that address environmental issues, sustain economic development and contribute to a healthy, vibrant community as consistent with its principal goals. Where there is a specific activity that could be funded or a funding shortfall, and there is consistency with the Foundation's mission, we can seek financial support. Additionally, the Foundation will be a resource for communicating successes of the JCBRA to the citizens of Jackson County. Where appropriate, the Authority may also have developers share the cost of certain environmental assessment activities.

Where tax increment financing (TIF) can be employed, the County will aggressively evaluate such options. Through previous Brownfield Plans the Brownfield Redevelopment Authority is capturing tax increment. The initial year of capture (2012) will yield \$10,000 - \$15,000. Several more projects in the pipeline are expected to yield increases in taxable value in 2014 and beyond significantly boosting the income of the program (estimated annual income at \$25,000 - \$30,000). **The County will use this annual income** to continue to support the activities of the Assessment Grant either by co-funding work completed through the grant, paying for non-eligible costs that are vital to a project's success, or paying for the oversight costs associated with the execution of the grant.

The cost for administering the JCBRA inclusive of public notices, development of agendas and administering meetings, printing costs, program promotion, cross-marketing the brownfield program to other groups and local units of government, securing technical services through a competitive process, updates to partners and the County is a cost share that is typically donated time by Staff and partners. This **donation of time and resources** is estimated to average 15 hours per month which at \$35/hour represents a minimum leveraged value of \$19,000 over the grant period (\$6,300 per year).

3 Community Engagement and Partnerships

3.a Plan for Involving Targeted Community and Other Stakeholders and Communicating Project Progress

The Jackson County Brownfield Redevelopment Authority understands that it will be critical to have open and ongoing communications to effectively implement this project. Due to the complex nature of some of the Priority Sites and the potential public health exposures, neighboring residents and businesses will be engaged to ensure that decisions being considered by the Authority address the concerns of the affected community.

There are no established neighborhood groups or organizations in the areas of the Priority Sites offering an existing communication network. Thus, in order to **involve the affected community** it will be necessary to utilize the local units of government. Through communications with Township Supervisors and Trustees, presentations at public Township Board meetings, etc. we can educate local leaders and involved residents about project goals, progress and outputs. We can use these forums where appropriate to hold public hearings that allow us to solicit input from the affected community. We will also post information on websites and social media. The JCBRA maintains a website and regularly posts information, Brownfield Plans and meeting minutes on line. This website also serves as a means of providing technical information, contact information to the Authority Staff, information on open meetings where the public is invited to participate, and other resources that inform the citizens of specific issues at local sites and the resources to help them understand, evaluate and voice their concerns about the brownfields in their neighborhood. Regarding complex or sensitive public health issues, it will be necessary to involve health professionals that have deft and thoughtful communication skills to convey such information to the public. County Health Department staff (see below) are available to assist in these communications. Additionally, we may reach out to TAB and/or the Agency for Toxic Substances and Disease Registry to assist in these delicate situations. In the past we have established repositories for technical documents at the Public Library, and also frequently disclose technical reports to the MDEQ, thereby making information available to the public.

The business community in the target area and the County will also be involved to ensure they are informed of redevelopment opportunities on Brownfield sites and the potential incentives available through the Assessment Grant and County's Brownfield Redevelopment program. **This plan will be accomplished** through partnerships including The Jackson Area Chamber of Commerce, The Enterprise Group and Jackson Area Manufacturers Association (JAMA), Jackson Area Association of Realtors, and others. For example, the Authority hosted a "Community Outreach for Commercial Lenders" event in summer 2010 that brought together local commercial lenders to inform them of available financial incentives related to brownfield redevelopment. Efforts will be made to educate the business community about the program and its benefits through presentations, news articles in the newsletters of our partners, open houses, attendance at community events, etc. The Authority has a strong partnership with the local Chamber of Commerce and can work with that organization to further involve the business community. The Authority can avail itself of local radio and cable t-v programs which feature daily guests in a news-talk format. JAMA produces a cable program, "Made in Jackson," featuring area business success stories. These outlets provide a platform for the Authority to **promote the availability, progress, and success of the Brownfield Redevelopment program**, specifically the Assessment grant, and involve the community. The JCBRA meets on a regular basis. These meetings, dates and times are posted, and are open to the public, and include an opportunity for the public to address the Authority, express their concerns and provide input. We will continue to hold these meetings and provide this opportunity for public participation. In addition to posting, all partnership entities receive e-mail notifications of the meetings and the agenda packets.

3.b Partnerships with Government Agencies

3.b.i Partnerships with Local/State/Tribal Environmental and Health Agencies

We have developed a strong working relationship with the MDEQ, the Jackson County Health Department, and several other departments and organizations in the County. MDEQ staff is invited to attend JCBRA meetings, as **MDEQ involvement in Assessment grant projects is necessary** throughout the brownfield redevelopment process. MDEQ's Mitch Adelman (Remediation Division Supervisor) and Lori Aronoff (Project Manager for Jackson County) are regularly updated and consulted. They provide additional expertise related to liability and funding issues, regulatory requirements, and access to technical support on such issues as vapor intrusion and other impending regulatory matters. Where U.S. Small Business Administration (SBA) loans are used by local businesses, MDEQ approval of cleanup plans and/or Due Care plans becomes necessary to meet the SBA's environmental policy requirements. If assessment or cleanup activities occur through a Brownfield Plan, it will require review and approval from the JCBRA and the County Commission upon completion of a public hearing. If school taxes will be captured through a Brownfield Plan, it will be necessary for MDEQ/Michigan Strategic Fund to review and approve the plan. The Authority works closely with the **Jackson County Health Department (JCHD)** to inform it of project goals, outputs, and data that can be used to evaluate risks to public health associated with brownfields. Because of the nature of the Priority Sites and the potential risks, it may be necessary to involve health professionals that have the communication skills to convey such information to the public. The JCHD staff – specifically Mr. Ted Westmeier, Director and Mr. Steve Hall, Director of Environmental Health – is available to assist in these communications, review environmental data and aid in evaluating the public's risk. Where private water supply wells may be at risk, the JCHD can assist in coordinating regular monitoring of those wells and communicating results to the users of those water supply systems. We may also reach out to TAB and/or the Agency for Toxic Substances and Disease Registry to assist in these delicate communications to the public.

3.b.ii Partnerships with Other Relevant Federal, State and Local Governmental Agencies

The JCBRA is collaborating with the Jackson County Land Bank (Land Bank). The Land Bank can acquire, demolish, rehab, dispose of and hold on to tax-reverted properties returning them to productive use in a rapid manner. The Land Bank, in concert with other organizations, agencies, communities and developers will ensure a coordinated revitalization plan for the community. The Land Bank currently has 48 properties in their inventory, with numbers growing. The City of Jackson has a total of 41 vacant properties in their inventory (*August 2013 Recap*, Jackson County Land Bank Personnel, and Finance Report). The Land Bank can work quickly to eliminate or rehabilitate the blighted properties that are so numerous in the **target community**, providing affordable housing for the residents or business opportunities. The Land Bank has also partnered with the local Habitat for Humanity and the Community Action Agency to assist in rehabilitations or deconstruction of materials. The JCBRA,

through the Land Bank, can also leverage many of the brownfield tax increment tools to further enhance incentives to a site including site preparation activities, installation or rehabilitation of infrastructure, and other benefits. These funds were used to demolish blighted structures, build affordable housing for low income populations including seniors, and create community gardens and green spaces (www.jacksoncountylandbank.org).

3.c Partnerships with Community-Based Organizations

The County is excited about the community-based organizations that have expressed a willingness to partner on this project. The selected organizations represent the various **stakeholders** that may be affected by Brownfield sites in our communities and/or have resources to assist with strengthening our program. Ultimately, it is the JCBRA's goal to address and reuse all brownfield sites in the County creating a movement to prevent the creation of new brownfields. This can only be done through a collaborative effort which engages all affected populations. To that end, the following organizations have graciously accepted our call to action and will play an affirmative role in the implementation of the EPA Assessment Grant: **The Greater Jackson Area Chamber of Commerce** - Provides support and promotion for brownfield redevelopment in the business community. Through newsletters and hosted events, the Chamber provides a direct line of communication to Jackson's business community to promote the Assessment Grant, elicit public involvement, promote successes, and seek out potential users of the Assessment Grant funds. **The Enterprise Group** - A County-wide economic development corporation which promotes brownfield redevelopment initiatives in the business community. The Enterprise Group provides contractual staffing assistance to the JCBRA, the Economic Development Corporation of Jackson County, and all Local Development Finance Authorities (2) and Downtown Development Authorities (2) outside the City of Jackson, within Jackson County. **South Central Michigan Works!**-Regional Economic Development Agency that supports the brownfield program and helps connect the public with the job opportunities created by assessment, cleanup and redevelopment of brownfields in the County. **Baker College** - A non-profit career college committed to job growth and job creation in the community. Baker College provides a venue for community outreach events hosted by the JCBRA. Additionally, Baker College will lend free business expertise, with faculty and administrators reviewing the projects and plans. This helps ensure that the Authority uses public funds on projects that have a strong likelihood of success. **Jackson Community Foundation**-The Foundation is dedicated to improving the lives of all citizens of greater Jackson. It will support the brownfield program by helping promote the success of the program to County citizens. In addition, we look for ways that the Foundation can provide financial resources, particularly for areas where there is funding gap and a strong overlap in missions. **Jackson College** - Jackson College (JC) will serve as an educational and economic force for Jackson County. JC will offer educational opportunities that include job training, commercial opportunities, and access to jobs and will work to help promote local entrepreneurial activities. **Community Action Agency** is a valued partner helping convert blighted residential properties into new homes through partnership with the County Land Bank Authority and Habitat for Humanity. Through these projects they are able to help us broadcast the benefits of this Grant and the Brownfield program to affected citizens.

4 Project Benefits

4.a Health and/or Welfare and Environment

This project, if funded, **anticipates outcomes** that improve the overall welfare, health and safety, environment and economy of Jackson County. Anticipated outcomes include job creation, investment, elimination of blight, improved public safety, control of public exposures to contaminants at the Priority Sites, an increased understanding of public health exposure and plans for mitigating any unacceptable exposures to contamination. The County is particularly interested in developments in the target area that **create jobs** and support a living wage. This will help to alleviate the high unemployment and poverty rates in the County. Our focus on several complex Priority Sites will help to **eliminate blighted conditions** at six of the most visible, underutilized and distressed sites in the County. We hope through assessment of these properties to eliminate environmental liabilities, control unacceptable risks, and better understand site conditions so that these properties **become more attractive in the marketplace**. Redevelopment will result in elimination of blighted conditions at several of the Priority Sites through removal of debris piles, demolition of blighted and functionally obsolete structures, and where possible, reuse of the buildings. Elimination of blight **provides social benefit** through improving the appearance of the neighborhoods, reducing venues for criminal activities, removing physical safety hazards and controlling access to these sites. A common concern at some of the Priority sites is the public's potential exposure to contaminants. **Improvements to public health** will be gained by assessment of these properties so that the potential

impacts to the public are better understood and plans to effectively control unacceptable exposures can be designed, such as elimination of water supply wells, vapor intrusion controls, removal of asbestos contaminated building debris, and other cleanup activities. This will involve working with property owners, developers, MDEQ, County Health Department and others to monitor water supplies, evaluate vapor intrusion pathways, control site access and promoting redevelopment. Improvements in storm water controls at contaminated sites would help improve water quality of the adjacent rivers at two priority sites. These outcomes are consistent with Jackson County's **Strategic Plan, goals and vision** for community safety, economic development, and public health. Redevelopment of the Priority sites helps to support **livability and equitable development principals**. New jobs in the Target Community would be accessible and within a walkable distance from local neighborhoods most affected by the presence of these Brownfields.

4.b Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

4.b.i Planning, Policies, Ordinances or Other Tools

Local ordinances have been in place to promote sustainable redevelopment – particularly within the City of Jackson where policies and ordinances are in place that promote water quality through improved storm water controls, create additional green spaces in the community, promote energy efficient site and street lighting, etc. Redevelopment at the priority sites would make use of existing urban infrastructure and relieve pressures on urban sprawl. Through improved stormwater control on sites, urban storm water runoff that enters the Grand River would be improved. We routinely connect redevelopers with recyclers in the area that minimize the disposal of demolition and construction debris. Consumers Energy is headquartered in Jackson and has a host of energy efficiency programs that are available to developers.

4.b.ii Example of Efforts to Integrate Equitable Development or Livability Principles

The neighborhood planning process for reuse of the Former Acme Site has included a strong focus on the walkable connection between this site and the downtown city center as well as opportunities to create outdoor recreational spaces. Specifically, although a trailway exists near the site – signage could be used to better mark the trail and promote walkability. A nearby school that plans to close may provide an area that could be converted into public recreational greenspace. These amenities create value in a neighborhood that can create additional economic investment to the benefit of the neighborhood, provide additional transportation options for disadvantaged residents without vehicles, and promote a healthy community with access to open spaces and trailways.

Another area of focus has been the City's ongoing efforts through policies and programs to remove excess blighted housing stock. These abandoned homes are a detriment to the value of the neighborhood and can be locations of criminal activity. Community Action Agency has been working with the City and the Jackson County Land Bank to take certain properties, clear the site, and work with Habitat for Humanity to provide new affordable housing. The Assessment Grant could be used to help make these transitions more affordable and leverage the federal investment by offsetting the cost of addressing asbestos, lead paint, fuel oil, and other hazardous material concerns.

4.c Economic or Non-Economic Benefits (long term benefits)

4.c.i Economic Benefits or Other non-Economic Benefits

The County has seen the tangible economic benefits that result from Brownfield redevelopment projects. Previous brownfield redevelopment efforts leveraged \$46,000,000 in private investment into brownfield sites, retained of 128 jobs, and saw creation of 200-225 new jobs. We expect that the 12 projects to be completed using this grant would each create 10-25 jobs (based on past experience in industrial projects) and result in a \$2,700,000 investment. The economic benefit to local residents and the County will be manifested in jobs, increased employment, lower unemployment, lower poverty, and higher per capita incomes. These outcomes and expected benefits will tracked and measured, reported Quarterly to USEPA and the public. Another economic benefit is the increased tax revenues secured by the County, Townships and Schools through new construction projects. From past experience, we typically see a tax increment revenue of \$20,000 to \$40,000 on industrial sites. Redevelopment of the 12 successful projects could result in \$250,000 to \$500,000 in additional annual tax revenues for the local community.

4.c.ii Planned Efforts to Promote Local Hiring and Procurement

All project developers funded by the Assessment Grant will be provided information about Michigan Works – the local work force development agency. Through this agency, unemployed residents in the Target Community and County have a means of applying for new jobs created from redevelopments. The local economic development agency (The Enterprise Group) maintains a long list of various suppliers and support businesses that can promote local procurement. Consumers Energy headquartered in Jackson has

assisted the Michigan Economic Development Council (MEDC) to create a database of Michigan-based businesses that is accessible on-line and contains many local businesses and vendors to promote "Buy Local" and solicit local employment opportunities. Through these existing efforts we hope to connect residents in the affected community with the economic opportunities created through redevelopment.

5 Programmatic Capability and Past Performance

5.a Programmatic Capability

The County has an **established team** that is experienced and capable of implementing the anticipated projects using the Assessment Grant and other tools that leverage the Grant's value. The County will utilize its Brownfield Redevelopment Authority which is staffed by Ms. Amy Torres and Ms. Debbie Kelly of the Enterprise Group, Inc. of Jackson, each of whom have over 15 years of direct experience managing Brownfield Redevelopment Authorities and related programs. Amy Torres has been involved with economic development since 2003, and is currently Vice President of Economic Development for The Enterprise Group of Jackson, Inc. (EG). Debbie Kelly has been involved with economic development since 1999, and is currently Director of Marketing for The EG. Together Ms. Torres and Ms. Kelly oversee the Authority, the Jackson County Economic Development Corporation (EDC), two Local Development Finance Authorities, and two Downtown Development Authorities. The EG administers a Business Accelerator Fund through the Small Business & Technology Development Center, and collaborates with Baker College to operate a high-technology business incubator. In the event of turnover, either Amy or Debbie is capable of managing the entire program during a transition period. In addition, the CEO of The EG, Tim Rogers, is capable and willing to lend additional executive support. The County and Authority will engage a private consulting firm(s) (in compliance with 40 CFR 30, 31 and 33) for technical expertise beyond that provided by the MDEQ. Legal Counsel for the Authority is provided by Ms. Diane Bower of Marcoux, Allen, et al. who provides review of contracts, property access agreements, development and reimbursement agreements, loan documents, and other issues as needed. MDEQ Staff – Mitch Adelman (Remediation Division Supervisor) and Lori Aronoff (Project Manager for Jackson County sites) are regularly updated and consulted on projects. They provide additional expertise related to liability and funding issues, regulatory requirements, and access to technical support. In addition to these key players, the program is supported by various partners who assist in evaluating and communicating public health issues, evaluating the business viability of redevelopment plans, broadcasting the successes and opportunities of the project to the public and business community, etc.

5.b Audit Findings

Jackson County and the JCBRA have never had adverse audit findings as related to OMB Circular A-133.

5.c Past Performance and Accomplishments

5.c.i Currently or Has Ever Received an EPA Brownfields Assessment, Revolving Loan Fund, or Cleanup Grant

1. Compliance

Jackson County previously had the following U.S. EPA Brownfields Assessment Grants:

- Brownfields 1999 Assessment Pilot, \$200,000 and Supplemental Assessment Pilot \$150,000. These funds have been completely expended. The County consistently met the requirements for QAPP development, eligibility determinations, Sampling Plans, HASPs, Quarterly Reports, Property Profile Sheets, Financial Status Reports, Community Notification and close out documentation. The Authority acquired technical expertise to execute these projects using a competitive RFP process.
- Brownfields 2004 Assessment Grant, \$200,000. These funds have been completely expended. The County consistently met the requirements for QAPP development, eligibility determinations, Sampling Plans, HASPs, Quarterly Reports, Property Profile Sheets, Financial Status Reports, Community Notification and close out documentation. The Authority acquired technical expertise to execute these projects using a competitive RFP process.

2. Accomplishments

Using the Assessment Pilot, the Authority successfully completed a Site Inventory, and completed assessment activities at several sites which included supporting development of the new Consumers Energy Headquarters in downtown Jackson – a Phoenix Award Winner (People's Choice). Using the Assessment grant, the County successfully completed assessment activities at seven sites including extensive assessment activities at one large site (Armory Arts), where a former prison and armory was converted into residential space. These funds leveraged \$13,000,000 in private investment and created 200 jobs.

Attachment A – Letter from the State



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

December 12, 2013

Ms. Amy Torres
Vice President of Economic Growth
The Enterprise Group
One Jackson Square, Suite 1100
Jackson, Michigan 49201

Dear Ms. Torres:

SUBJECT: Acknowledgment Regarding the United States Environmental Protection Agency
Brownfield Assessment Grant Proposals

Thank you for your recent request for a letter of acknowledgment for Jackson County's proposal to the United States Environmental Protection Agency's (EPA) brownfield grant program. The Department of Environmental Quality, Remediation and Redevelopment Division (RRD), is supportive of county-wide redevelopment efforts and has reviewed the information you provided regarding your proposals.

Jackson County is applying for a \$200,000 hazardous substances assessment grant and a \$200,000 petroleum assessment grant, both of which can be used to conduct assessment activities at eligible brownfield sites throughout the county. Jackson County is considered eligible for these grants as a general purpose unit of local government.

Should the EPA offer these brownfield grants to Jackson County, it would promote redevelopment and reuse of underutilized and contaminated properties and improve the economic development and environmental conditions in the county. If you need further information or assistance regarding specific brownfield sites, please contact Mr. Ron Smedley, Brownfield Redevelopment Coordinator, RRD, at 517-284-5153, or you may contact me.

Sincerely,

Carrie Geyer, Chief
Brownfield Redevelopment Unit
Program Support Section
Remediation and Redevelopment Division
517-284-5182

cc: Ms. Jan Pels, USEPA Region 5
Mr. Ron Smedley, DEQ

Attachment B – Threshold Criteria

Threshold Criteria for Assessment Grant

Applicant – Jackson County (County), Michigan

1. Applicant Eligibility

Jackson County is a general purpose local unit of government.

2. Letter from the State of Michigan

The County received a letter from the Michigan Department of Environmental Quality (MDEQ) acknowledging the County's plan to conduct assessment activities through the pursuit of Federal grant funds. Please refer to attached letter.

3. Community Involvement

The Jackson County Brownfield Redevelopment Authority understands that it will be critical to have open and ongoing communications to effectively implement this project. Due to the complex nature of some of the Priority Sites and the potential public health exposures, neighboring residents and businesses will be engaged to ensure that decisions being considered by the Authority address the concerns of the affected community.

There are no established neighborhood groups or organizations in the areas of the Priority Sites offering an existing communication network. Thus, in order to **involve the affected community** it will be necessary to utilize the local units of government. Through communications with Township Supervisors and Trustees, presentations at public Township Board meetings, etc. we can educate local leaders and involved residents about project goals, progress and outputs. We can use these forums where appropriate to hold public hearings that allow us to solicit input from the affected community. We will also post information on websites and social media. The JCBRA maintains a website and regularly posts information, Brownfield Plans and meeting minutes on line. This website also serves as a means of providing technical information, contact information to the Authority Staff, information on open meetings where the public is invited to participate, and other resources that inform the citizens of specific issues at local sites and the resources to help them understand, evaluate and voice their concerns about the brownfields in their neighborhood. Regarding complex or sensitive public health issues, it will be necessary to involve health professionals that have deft and thoughtful communication skills to convey such information to the public. County Health Department staff (see below) are available to assist in these communications. Additionally, we may reach out to TAB and/or the Agency for Toxic Substances and Disease Registry to assist in these delicate situations. In the past we have established repositories for technical documents at the Public Library, and also frequently disclose technical reports to the MDEQ, thereby making information available to the public. The business community in the target area and the County will also be involved to ensure they are informed of redevelopment opportunities on Brownfield sites and the potential incentives available through the Assessment Grant and County's Brownfield Redevelopment program. **This plan will be accomplished** through partnerships including The Jackson Area Chamber of Commerce, The Enterprise Group and Jackson Area Manufacturers Association (JAMA), Jackson Area Association of Realtors, and others. For example, the Authority hosted a "Community Outreach for Commercial Lenders" event in summer 2010 that brought together local commercial lenders to inform them of available financial incentives related to brownfield redevelopment. Efforts will be made to educate the business community about the program and its benefits through presentations, news articles in the newsletters of our partners, open houses, attendance at community events, etc. The Authority has a strong partnership with the local Chamber of Commerce and can work with that organization to further involve the business community. The Authority can avail itself of local radio and cable t-v programs which feature daily guests in a news-talk format. JAMA produces a cable program, "Made in Jackson," featuring area business success stories. These outlets provide a platform for the Authority to **promote the availability, progress, and success of the Brownfield Redevelopment program**, specifically the Assessment grant, and involve the community.

The JCBRA meets on a regular basis. These meetings, dates and times are posted, and are open to the public, and include an opportunity for the public to address the Authority, express their concerns and provide input. We will continue to hold these meetings and provide this opportunity for public participation. In addition to posting, all partnership entities receive e-mail notifications of the meetings and the agenda packets.

4. Site Eligibility and Property Ownership Eligibility

Since this application is a community-wide proposal, this section is not applicable

Attachment C – Letters of Support from Community-Based Organizations



Baker College
2800 Springport Road
Jackson, Michigan 49202
Telephone (517) 789-6123
Admissions (517) 788-7800
Fax (517) 789-7331

November 12, 2013

Ms. Amy Torres

Executive Director

Jackson County Redevelopment Authority

One Jackson Square

Jackson, MI 49201

Dear Ms. Torres,

As the largest, private, non-profit career College in the State of Michigan, Baker College is committed to helping develop job opportunities for students and graduates. The College would be willing to host community events and forums to support the brownfield redevelopment efforts in our community at no cost. The College may also be able to assist by lending staff to review business plans and projects.

Thank you for your consideration of the proposal for the Jackson community. Please call me at 517-789-6123 if you have further questions.

Sincerely,

Dr. Patty Kaufman

President, Baker College of Jackson



JACKSON COUNTY
Chamber of Commerce

**experience
jackson**

January 8, 2014

Amy Torres, Executive Director
Jackson County Brownfield Redevelopment Authority
One Jackson Square, Suite 1100
Jackson, MI 49201

RE: U.S. EPA Hazardous Substance and Petroleum Assessment Grant Proposal

Dear Mrs. Torres:

The Jackson County Chamber of Commerce and Experience Jackson (Jackson County Visitors Bureau) are supporters of the County's efforts to tackle issues related to complicated brownfield sites. Since 2002, Jackson County has been fortunate enough to receive funding to make some of the higher-hanging projects come to fruition.

One of our primary goals is to create a strong local economy. Through collaborative partnerships with community and economic development organization, we work to attract and retain every job and every employer in Jackson County. The JCBRA is a vital element in our ability to do so. Redevelopment of Brownfields by businesses provides much needed jobs to the community.

Both the Chamber of Commerce and Experience Jackson provide direct lines of communication to the business. We strongly believe the County and its experience managing and through the JCBRA is a necessary tool for the economic success of redevelopment efforts in the community.

We are proud to be among the many entities involved in making that success a reality in the County of Jackson and will continue to work with the County and other community-based organizations in supporting Brownfield Redevelopment efforts to promote employment and economic development.

Mindy-Bradish-Orta
President/CEO, Jackson County Chamber of Commerce
Executive Director, Jackson County Visitors Bureau



Jackson

community foundation

For Jackson. For good. For ever.

OFFICERS

Hendrik Schuur
Board Chair

Karen Chaprnka
Incoming Chair

Anne Campau
Immediate Past Chair

TRUSTEES

John Butterfield
Rick Davies
Tom Draper
Travis Fojtasek
H. Ronald Griffith
John Gruel
Kevin Oxley
Jim Miller
Philip Moilanen
Kathy Patrick
Randy Purvis
Cindy Rider
Jon Robinson
Jim Serino

STAFF

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Supporting Organization:
College and Career
Access Center

November 18, 2013

Amy Torres
Enterprise Group
Jackson County Brownfield Redevelopment Authority
One Jackson Square, Suite 1100
Jackson, MI 49201

Re: 2014 EPA Brownfield Assessment Grant

Dear Ms. Torres,

The Jackson Community Foundation is pleased to support the Jackson County Brownfield Redevelopment Authority (JCBRA) in applying for the 2014 EPA Brownfield Assessment Grant.

As you know, the Foundation is very interested in environmental quality and has proven our commitment by providing funding for environmental issues in the past. We support opportunities that address the once-thriving industrial areas in an effort to sustain economic development, address environmental issues, and to ensure that brownfields are cleaned up and reused. We see this happening in ways that contribute to healthier buildings and neighborhoods, that mitigate environmental conditions through remediation, that improve access by residents to greenspace, recreational property, transit, schools, healthy and affordable food, that improve employment and affordable housing and opportunities for local residents, and that reduce toxicity, illegal dumping and blighted vacant properties.

Based on your mission and your involvement throughout Jackson County, we believe the Jackson Community Foundation would be able to aid the JCBRA in involving the affected community in assessment of cleanup decisions. We would also be a resource in communicating success to the citizens of Jackson County as they happen. We are pleased to support actions that lead our community toward growth and stability.

If you have any questions about our support, please do not hesitate to call. In the meantime, I wish you every success and look forward to hearing more about the project when it is funded.

Sincerely,

Monica Moser



The Enterprise Group
of Jackson, Inc.

November 12, 2013

Ms. Amy L. Torres, Executive Director
Jackson County Brownfield Redevelopment Authority
One Jackson Square, Suite 1100
Jackson, MI 49201

RE: U.S. EPA Brownfield Hazardous Substances and Petroleum Assessment Grant Proposal

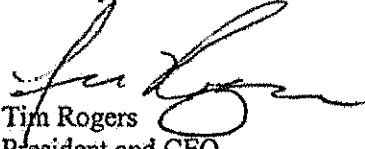
Dear Ms. Torres,

As one of our local partners, it is my pleasure to write a letter in support of Jackson County's application, for the current submission of the EPA Brownfield Hazardous Substances and Petroleum Assessment Grant.

The Enterprise Group of Jackson Inc. has worked collaboratively with the County as well as the Jackson County Brownfield Redevelopment Authority (JCBRA) to maintain and improve the quality and health of Jackson County for several years now. The County Brownfield program has been successful in assisting The Enterprise Group's economic development efforts by offering opportunities for growth, in an effort to create jobs, address environmental issues, and creating a safer place to live and work. Assistance has been given to area businesses in assessing contaminated property in order to expand their businesses and create new jobs as a result.

Obtaining these funds will assist in meeting the economic goals of the County. On behalf of the County, The Enterprise Group of Jackson, Inc. will assist the JCBRA as grant administrator, in marketing efforts for the Brownfield Authority and Brownfield properties, as well as in educating the business community about Brownfield incentives.

Sincerely,



Tim Rogers
President and CEO



**THE
JACKSON
COMMUNITY
COLLEGE
FOUNDATION**

3000 Blake Rd
Jackson, MI 49203
P 517.787.0244

www.jccmi.edu/foundation

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President

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Richard Dodge
Dr. George Potter '56'

Legal Counsel
Philip M. Moilanen

JAN 15 2014

December 28, 2013

Amy Torres, Executive Director
Jackson County Brownfield Redevelopment Authority
One Jackson Square, Suite 1100
Jackson, MI 49201

RE: U.S. EPA Hazardous Substance and Petroleum Assessment Grant
Proposal

Dear Mrs. Torres:

On Behalf of Jackson College, I am pleased to submit this letter of support for the Jackson County (County) in their effort to obtain brownfield assessment grant funding. The County has a successful track record in assisting businesses, both new and existing, with their start-up and expansion needs. Having the availability of brownfield assessment dollars assists with the efforts to attract new businesses and retaining existing ones and offers prime development opportunities.

As an educational and economic force in Jackson, Jackson College can offer educational opportunities that can be utilized during Brownfield redevelopment, offer job training opportunities, commercial opportunities, access to jobs and help promote local entrepreneurial activities. Additionally, we feel that we can help keep the community engaged, involved, and participating in redevelopment activities.

We are committed to promoting the welfare of our students and communities and will be available for support during the duration of the upcoming assessment grant and beyond.

Sincerely,

Jason H. Valente, President
JC Foundation and North Campus



November 11, 2013

Amy Torres
Executive Director
Jackson County Brownfield Redevelopment Authority
One Jackson Square, Suite 1100
Jackson, Michigan 49201

Dear Ms Torres:

I am writing to express strong support from the Jackson Area Manufacturers Association (JAMA) for Jackson County's EPA Hazardous Substance and Petroleum Assessment Grant application.

JAMA represents over 250 manufacturing and associate member companies throughout south-central Michigan. The majority of our members are advanced manufacturing facilities that are growing and increasingly looking at opportunities for expansion. This funding will be helpful in assisting Jackson County to respond to these expansion and investment opportunities.

Sincerely,

Bill Rayl
Executive Director
Jackson Area Manufacturers Association

SOUTH CENTRAL MICHIGAN
WORKS!
Making Workforce Investments Count

Administrative Office

21 Care Drive
Hillsdale, MI 49242
(517) 437-3381
Toll-Free (888) MI WORKS
FAX (517) 437-3249
Michigan Relay Center:
(800) 649-3777

Hillsdale County

21 Care Drive
Hillsdale, MI 49242
(517) 437-3381
FAX (517) 437-4128

Jackson County

Commonwealth
Commerce Center
209 E. Washington Ave.
Suite 100
Jackson, MI 49201
(517) 841-5627
FAX (517) 782-0140

Lenawee County

Lenawee County
Human Services Bldg.
1048 S. Winter Street
Suite 1014
Adrian, MI 49221
(517) 266-5627
FAX (517) 266-2745

www.scmw.org

December 5, 2013

Ms. Amy Torres
Jackson County Brownfield Redevelopment Authority
One Jackson Square, Suite 1100
Jackson, MI 49201

RE: EPA Brownfield Hazardous Substances and Petroleum Assessment Grant

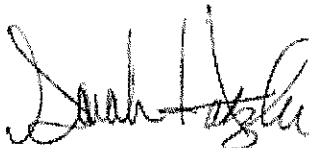
The South Central Michigan Works! (SCMW) Workforce Development Board's Business Services Team is a proud partner of the Jackson County Brownfield Redevelopment Authority (JCBRA). The JCBRA was one of the first in the state to form its Brownfield Redevelopment Authority in 1998 and has a long-standing relationship in promoting and supporting Brownfield Redevelopments in the business community.

Our Business Services Team collaborates with workforce, education and economic development partners to ensure that business is competitive, and to save and create jobs. The County BRA has a strong history of accessing State and federal funds to support Brownfield Redevelopment projects. Redevelopment of Brownfields by businesses provides much needed jobs in the community. Past history indicates that the projects typically create 10-20 jobs per project. If there were 2-3 projects per year this could translate into 100-300 new jobs created for over a five-year time frame. This is considered a very conservative estimate and is of vital importance to the local economy. SCMW currently funds many economic development initiatives in support of workforce development. We partner with The Enterprise Group, and others, to provide incentives for business to remain in the county and promote business attraction activities.

SCMW provides a direct line of communication to the business community and can promote redevelopment activities. We strongly believe this is a necessary tool for the economic success of redevelopment efforts in the County and that the JCBRA has demonstrated excellence in maintaining the well-established, long-term relationships necessary to continue managing and promoting Brownfield redevelopment in our community.

We are proud to be among the many entities involved in making that success a reality in Jackson and will continue to work with The Enterprise Group, the JCBRA and other community-based organizations in supporting Brownfield Redevelopment efforts to promote employment and economic development in Jackson County.

Respectfully,



Sarah Hartzler
President



Attachment D – Other Factors Checklist

Appendix 3

Other Factors Checklist

Name of Applicant: Jackson County Government

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

- ☐ Community population is 10,000 or less
- ☐ Federally recognized Indian tribe
- ☐ United States territory
- ☐ Applicant will assist a Tribe or territory
- ☐ Targeted brownfield sites are impacted by mine-scarred land
- ☐ Targeted brownfield sites are contaminated with controlled substances
- ☐ Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress.
- ☒ Project is primarily focusing on Phase II assessments – **Page #10**
Continuing assessment grant funding will utilize 69% or \$275,000 from the total (\$400,000) budget on twelve (12) Phase II Environmental Site Assessments.
- ☒ Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation. **See Attached Documentation**
- ☒ Community experiencing plant closures (or other significant economic disruptions) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruptions. – **Page # 5 see also attached WARN Data Documentation.**
- ☐ Recent (2008 or later) significant economic disruption (unrelated to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.
- ☐ Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, **applicant must attach documentation** which demonstrates this connection to a HUD-DOT-EPA PSC grant.
- ☐ Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant
- ☐ Community is implementing green remediation plans.
- ☐ Climate Change (also add to “V.D. Other Factors”)



Brownfield Redevelopment Authority
Of Jackson County
Served By The Enterprise Group

January 22, 2014

Ms. Linda Mangrum
USEPA Region 5
77 West Jackson Blvd., Mail Code SM-7J
Chicago, IL 60604-3507

RE: RFP No. EPA-OSWER-OBLR-13-05
U.S. EPA Brownfield Hazardous Substances and Petroleum Assessment Grant Proposal

Dear Ms. Mangrum,

In an effort to secure additional U.S. EPA Assessment Grant funds for Jackson County, The Jackson County Brownfield Redevelopment Authority (JCBRA) pledges funds that we have raised through Brownfield Plans, TIF capture, and Brownfield Revolving Loan Fund repayments to the redevelopment of brownfields in Jackson County. To date, the JCBRA has approximately \$60,000 in those various accounts to use as leverage for future brownfield projects to provide loans or contractual services to assess and/or cleanup sites, and provide services necessary to ensure the efficient functioning of the Brownfield Redevelopment Authority.

The JCBRA is staffed and served by The Enterprise Group of Jackson, Inc. through a contractual agreement. The Enterprise Group of Jackson, Inc. assists the JCBRA in marketing efforts for the Brownfield Authority and Brownfield properties, as well as educating the business community about Brownfield incentives through our EG Web site, social media sites, and our Retention Expansion Business Success Program.

The County Brownfield Program has been successful in assisting The Enterprise Group's economic development efforts by offering opportunities for growth, creating jobs, addressing environmental issues, and creating a safer place to live and work. Obtaining these funds will assist in meeting the economic goals of Jackson County.

Sincerely,

Debbie Kelly
JCBRA Grant Administrator on behalf of

Amy L. Torres
JCBRA Executive Director

Company Name	City	Date Received	Incident Type	Number of Employees Lost Due To Layoffs
Hostess Brand	Jackson	05/07/2014	Other	13
Consumer Services	Jackson	2/2/2011	Other	23
Jackson Citizen-Patriot	Jackson	11/7/2011	Mass Layoff	71
Sparton Electronics	Jackson	3/4/2009	Mass Layoff	206
Call Center HR	Jackson	3/16/2009	Other	5
Milsco Manufacturing	Jackson	5/8/2009	Plant Closing	93
Kaneka Texas Corporation	Jackson	4/21/2008	Plant Closing	50
Kaneka	Jackson	6/2/2008	Plant Closing	50
Gerdau Macsteel	Jackson	12/29/2008	Mass Layoff	299

*Michigan Department of Technology, Management and Budget

WARN (Worker Adjustment and Retraining Notification) Data from 01/01/2009-01/14/2014

Plant closing: A covered employer must give notice if an employment site (or one or more facilities or operating units within an employment site) will be shut down and the shutdown will result in an employment loss* for 50 or more employees during any 30-day period.

Mass layoff: A covered employer must give notice if there is to be a mass layoff which does not result from a business closing, but will result in an employment loss* at the employment site during any 30-day period for 500 or more employees, or for 50-499 employees if they make up at least 33% of the employer's active workforce.

Other: Indicated a Layoff or Plant Closing of less than 50 employees at one time.